

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
ORANGEBURG DIVISION**

AMGUARD INSURANCE COMPANY,	)	CASE NO: 5:19-cv-00635-JMC
	)	
Plaintiff,	)	
v.	)	<b><u>RENEWED MOTION OF PLAINTIFF</u></b>
	)	<b><u>AMGUARD INSURANCE COMPANY</u></b>
SG PATEL AND SONS II, LLC, <i>et al.</i> ,	)	<b><u>TO POST BOND</u></b>
	)	
Defendants.	)	

Plaintiff respectfully renews its prior Motion (DE 10) for an Order authorizing the posting of bond, pursuant to 28 U.S.C. § 1335, with respect to the captioned matter.

Plaintiff has filed its Complaint for Interpleader, In the Nature of Interpleader, and for Declaratory Judgment. Plaintiff seeks to post bond in the amount of Three Million Dollars (\$3,000,000.00), the maximum sum sought by Defendants in connection with the insurance policy which forms the basis for this matter, such bond to abide future order or judgment of the Court with respect to the subject matter of the controversies presented herein and to thereupon be discharged from any and all liability in connection with the issues, controversies, sums, and/or bond that are the subject of this Complaint for Interpleader, in the Nature of Interpleader, and Declaratory Judgment.

At the February 4, 2020 hearing, Plaintiff advised that it is ready, willing, and able to post bond in the sum of Three Million Dollars (\$3,000,000.00). (DE 75-2 at 10.) Plaintiff remains ready, willing, and able to do so, and in this regard, respectfully submits a proposed Order for the Court's consideration.

As a full explanation of the motion is contained within the motion, a memorandum in support has not been included. Plaintiff therefore respectfully moves the Court to enter the attached

Order to Post Bond in the foregoing amount, pending future order or judgment of the Court with respect to the subject matter of the controversies herein.

Respectfully submitted,

/s/ Crystal L. Maluchnik

STEVEN G. JANIK (11301)

CRYSTAL L. MALUCHNIK (12573)

JANIK L.L.P.

Hilton Head Island, SC 29928

[Mail: P.O. Box 470550, Cleveland, OH 44147

440/838-7600 / (440) 838-7601 (Fax)

[Steven.Janik@Janiklaw.com](mailto:Steven.Janik@Janiklaw.com)

[Crystal.Maluchnik@Janiklaw.com](mailto:Crystal.Maluchnik@Janiklaw.com)

*Attorneys for Plaintiff AmGUARD Insurance  
Company*